

Admitted in New York State
& State of New Jersey

MICHAEL R. CURRAN
Attorney-at-Law
36-09 Main Street, Suite 9B-2
Flushing, New York 11354
(347) 549-2079 (phone)
(347) 778-5918 (facsimile)
[mrc4law@yahoo.com*](mailto:mrc4law@yahoo.com)

December 27, 2023

Hon. George B. Daniels,
Sr. United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street, Room 1310
New York, New York 10007

Filed via ECF System

In re: Chen et al. v. Hunan Manor Enterprise Inc. et al. 17-cv-0802-GBD-GWG (SDNY)
Two Applications Brought to the Court

Dear Judge Daniels:

The undersigned represents defendants A Taste of Mao, Inc. and Zhenqi Xiao ("Taste of Mao defendants") in the above-referenced matter. I submit this letter to the Court joined by Mr. Eric Li, counsel for all other defendants in the case.

Request for Briefing Schedule on Plaintiffs' Fee Motion

Mr. Li and I have conferred and have agreed that all defendants need a briefing schedule on the plaintiffs' fee motion. We respectfully request that the date January 13, 2024 be deemed the deadline for filing opposition to the plaintiffs' fee Motion. We have notified opposing counsel and asked if counsel have an objection to our joint request. I filed the request last evening, asking for a prompt response. There was no response aye or nay.

Query Requesting Clarification of the Court

As the Court recalls, the Court decided multiple Motions for Reconsideration. Taste of Mao defendants filed what was essentially a premature Motion under FRCP 59(e) with their Motion for Reconsideration on differing grounds. Taste of Mao defendants respectfully inquire of the Court that, in denying the Taste of Mao defendants' Motion for Reconsideration, did the Court deny the Motion under FRCP 59(e) or are Taste of Mao defendants permitted to refile?

Mr. Li is aware of this query and the plaintiffs' attorneys were also alerted to same. There has been no comment or response to the query by plaintiff's attorneys.

Pursuant to Individual Practice Rule II(C):

- (i) Original date: 01/02/2024 fee motion opposition and FRCP 59(e)
- (ii) Zero prior requests
- (iii) N/A
- (iv) no response to query on consent

Respectfully submitted,

s/Michael R. Curran

Michael R. Curran

Attorney for Taste of Mao Defendants

cc: Law Offices of John Troy PLLC
Mr. Eric Li, Esq.